

**FILED**

**OCT 19 2022**

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CECIL JONES,

Defendant.

No. **4:22-CR-575-RLW/NCC**

**INDICTMENT**

The Grand Jury Charges:

**COUNT 1**

**18 U.S.C. § 1028(a)(2): Unlawful Transfer of an Identification Document**

On or about July 25, 2020, within the Eastern District of Missouri, the defendant,

**CECIL JONES,**

did knowingly transfer a false identification document, to wit: a false and fraudulent State of Missouri Driver's License, knowing that such document was produced without lawful authority, and the production or transfer of the false identification document was in or affected interstate commerce, and the offense involved the production or transfer of a false identification document that is or appears to be a driver's license.

All in violation of Title 18, United States Code, Section 1028(a)(2).

**COUNT 2**

**18 U.S.C. § 641: Theft of Government Property**

On or about August 11, 2020, within the Eastern District of Missouri, the defendant,

**CECIL JONES,**

did embezzle, steal, purloin, or knowingly convert to his use and the use of another, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: an Economic Injury Disaster Loan paid by the Small Business Administration in connection with the COVID-19 national emergency declaration, in the amount of \$149,900.00, creating a total loss to the government in excess of \$1,000.00.

All in violation of Title 18, United States Code, Section 641.

**FORFEITURE ALLEGATION**

1. Pursuant to Title 18, United States Code, Sections 982(a)(2)(b) and 1028(b), upon conviction of an offense in violation of Title 18, United States Code, Section 1028 as set forth in Count 1, the defendant shall forfeit to the United States of America any property constituting, or derived from, proceeds the defendant obtained, directly or indirectly, as a result of such violation and any personal property used or intended to be used to commit said offense. Also subject to forfeiture is a sum of money equal to the total value of the property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of such violation.

2. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 641 as set forth in Count 2, the defendant shall forfeit to the United States

of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violation. Also subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said violation.

3. Specific property subject to forfeiture includes, but is not limited to, the following:

- a. Approximately \$131,645.95 in funds from Bank Account #...6045 in the name of Corporate Enterprise Investments at Regions Banks; and
- b. Approximately \$6,585.94 in funds from Bank Account #...6053 in the name of Corporate Enterprise Investments at Regions Bank.

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING,  
United States Attorney

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DIANE E.H. KLOCKE, #61670MO  
Special Assistant United States Attorney